June 29, 2001

Jane R. Summerson Yucca Mountain Site Characterization Office Office of Civilian Radioactive Waste Management USDOE PO Box 30307 M/S 010 North Las Vegas, NV 89036 RECEIVED

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RE: Supplement to the DEIS for the Geologic Repository for the Disposal of High-Level Radioactive Waste at Yucca

Dear Jane:

Thank you for the opportunity to comment. I am a professional hydrogeologist with a Master's Degree and over 12 years professional experience including experience in Nevada.

My comments on the Supplement DEIS:

- 1, 2 I am opposed to the Yucca Mountain site. The site is potentially upgradient and therefore has the potential to impact Death Valley National Park.
- Surface aging will increase the release of radiation to the environment and should not be used.
- The site was originally selected due to the lack of groundwater. If the new design indicates the need for drip shields within the storage drifts it is obvious that the site is not as dry as originally thought. If new groundwater impacts and impacts to the site by groundwater have been identified, the site should not be used.
- I am in opposition to the transport of high-level waste though populated areas.

I am concerned that the DOE is now feels the need to make changes after the initial DEIS process. It appears that if the initial plan was not completely thought out that this one may not be. The S&ER flexible design allows for a degree of operator error if the wrong operating mode is selected. I appears that an element of design build is included in this system. Design build is an excellent system in areas where the impacts and effects are known (e.g. socio-economic impacts due to highway rebuilding), however it appears that there are two many unknowns at Yucca Mountain for this type of project. It appears that even this late in the design stage there are still too many unknowns. The thermal related effects are unknown at this point the Science and Engineering Report (may, 2001) states that the interaction of various elements are complex and cannot be fully captured in computer models. This appears to me to represent that the DOE does not know the effects of long term storage at Yucca Mountain.

I urge the DOE to abandon the Yucca Mountain site.

Thank You

Todd Leeds PO box 511266

SLC UT 84151

Toddeol@aol.com